

1 Government in February right after hearing in this court when  
2 I informed the Government and the Court we would turn over all  
3 of our information early. And there's no reason for them to  
4 have taken another month to do that.

5 But I also object to the limited portion of the 11:49:51  
6 individual master file being submitted. If it's going to be  
7 submitted over my objection, it should just be submitted.  
8 They should not get a second opportunity to redirect the  
9 witness as their prosecution theory evolves.

10 However, I don't think it should be allowed in at 11:50:17  
11 all, but if it's to be allowed in over my objection, then it's  
12 allowed in.

13 MS. EDELSTEIN: Your Honor, may I be heard?

14 THE COURT: Well, let's see. We do have two  
15 defendants, so I don't -- did you have -- 11:50:30

16 MR. KIMERER: These records relate to Mr. Quiel in  
17 the case.

18 My objection basically, really the certification  
19 would suffice as far as the record. But I think the real  
20 problem here is that the record that they're now offering 11:50:54  
21 where you don't have anybody is incomplete, as Mr. Minns has  
22 said. That it's just a snippet out of the master file.

23 Is that correct; Mr. Minns?

24 MR. MINNS: Yes.

25 MR. KIMERER: And I would think then that would be 11:51:07

1 improper and a misuse of the time, especially in light of the  
2 fact that I know Mr. Minns had requested that master file  
3 sometime ago, and I don't believe it was ever produced. And  
4 so, therefore, had lost the opportunity to cross-examine and  
5 do a whole bunch of different things on that, or to see how 11:51:21  
6 this all relates.

7 MS. EDELSTEIN: Your Honor, the Government can speak  
8 to the characterization of the document as incomplete.

9 THE COURT: All right. The objections are -- the  
10 objection to recalling the witness is overruled. You may 11:51:34  
11 recall the custodian.

12 MS. EDELSTEIN: Thank you.

13 THE COURT: Is that --

14 MS. EDELSTEIN: Your Honor, with respect to the  
15 witnesses, based on the delay that occurred with Mr. Rusch not 11:51:43  
16 being allowed to take the stand until today, the Government's  
17 remaining witnesses, other than two -- three of the  
18 Government's remaining witnesses are traveling some  
19 considerable distance, one from Switzerland, the custodian of  
20 records from Pictet & Cie, as well as one individual from New 11:52:00  
21 York, and a third individual who has come to trial to testify  
22 and was unable to testify due to the scheduling issues that we  
23 had with the -- on that day that he was here and a prior  
24 commitment he had to leave for.

25 The Government has reached out to defense counsel and 11:52:18